

From: [Powell, Susannah](#)
To: [Kevin Kutcel](#)
Subject: RE: 93647-2 Label: App rate language
Date: Friday, August 21, 2020 3:21:00 PM

Great, thank you!

From: Kevin Kutcel <kevinkutcel@gmail.com>
Sent: Friday, August 21, 2020 3:12 PM
To: Powell, Susannah <Powell.Susannah@epa.gov>
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>
Subject: RE: 93647-2 Label: App rate language

Susannah,

Attached are the revised labels per your comments below.

Warm Regards,

Kevin Kutcel
KRR Consulting LLC
5807 Churchill Way
Medina, OH 44256
440-263-7305
Fax: 440-398-0476

From: Powell, Susannah <Powell.Susannah@epa.gov>
Sent: Friday, August 21, 2020 2:46 PM
To: Kevin Kutcel <kevinkutcel@gmail.com>
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>
Subject: RE: 93647-2 Label: App rate language

Hi Kevin,

That language works. Thank you for the revision. A few last small things... Could you please change the "General Information" header to "Product Information" under Directions for Use? I also found two typos while looking it over you might like to address: "lb" should be "lbs." (last paragraph under General Information in parenthesis), & "as soon" should be "as soon as" in the 4th paragraph/section under General Information.

Thank you for your patience,

Susannah

From: Kevin Kutcel <kevinkutcel@gmail.com>
Sent: Thursday, August 20, 2020 3:30 PM
To: Powell, Susannah <Powell.Susannah@epa.gov>
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>
Subject: RE: 93647-2 Label: App rate language

Susannah,

Attached are both a highlighted label and clean label for EPA Reg. No. 93647-2 with the revisions we discussed.

Warm Regards,

Kevin Kutcel
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256
440-263-7305
Fax: 440-398-0476

From: Powell, Susannah <Powell.Susannah@epa.gov>
Sent: Thursday, August 13, 2020 11:04 AM
To: Kevin Kutcel <kevinkutcel@gmail.com>
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>
Subject: RE: 93647-2 Label: App rate language

Hi Kevin,

The changes in app rate are acceptable. However, when to apply the 5-15 lbs/acre for higher infestation rate is unclear. Does higher infestation imply inside the range 5,000-20,000 cell/mL, or is higher infestation above 20,000 cell/mL? Please replace "higher infestation" with more descriptive wording/range for the user.

Also please provide more description for application rate when cell numbers exceed 20,000 cell/mL

in the second paragraph. What lbs/acre rate should the user apply to one-half of the water area for cell numbers above 20,000 cell/mL, for example.

Lastly, there is a typo in the second sentence of the second paragraph under the "Determination of the application rate." I think you mean to say "more than 20,000 cells/mL" rather than "over than."

Please let me know if you have any questions.

Thank you,

Susannah

From: Kevin Kutcel <kevinkutcel@gmail.com>
Sent: Thursday, August 13, 2020 10:03 AM
To: Powell, Susannah <Powell.Susannah@epa.gov>
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>
Subject: RE: 93647-2 Label: App rate language

Ms. Powell,

Per your e-mail below and subsequent phone conversation, attached is the revised label for EPA Reg. No. 93647-2 in which the application rate has been revised to 0.5-2.5 lbs. acre and 5-15 lbs/acre for high infestations. Your cooperation is appreciated.

Warm Regards,

Kevin Kutcel
KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256
440-263-7305
Fax: 440-398-0476

From: Powell, Susannah <Powell.Susannah@epa.gov>
Sent: Wednesday, July 29, 2020 11:14 AM
To: kevinkutcel@gmail.com
Cc: Pfeifer, Chris <Pfeifer.Chris@epa.gov>

Subject: 93647-2 Label: App rate language

Good morning Mr. Kutcel,

This email is in regards to the application rate on the label for EPA reg no 93647-2. The rate of 0.5-80lbs is a very wide range and it is not clear under what conditions the different rates should be applied within the range of 5,000-20,000 cell/mL. This section needs to be updated with more specific, clarifying language about when to apply the lower and higher rates. Please update accordingly.

Also, the word “recommended” is discouraged and should be omitted whenever possible to prevent user discrepancies.

Please let me know if you have any questions. Feel free to call at 469-955-3279.

Thank you,

Susannah Powell
Risk Manager
Biochemical Pesticides Branch (BPB)
Biopesticides and Pollution Prevention Division (BPPD)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Powell.susannah@epa.gov